

## AOTCO METAL FINISHING CO., INC

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### CONFLICT MATERIALS POLICY

AOTCO Metal Finishing Co., Inc. is committed to ensuring the health, safety and protection of people and the environment. As required by the Conflict Materials provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act, HR 4173, Section 1502 (Conflict Minerals Act) and in the anticipation that this act will become law, AOTCO is working with all of its suppliers to confirm that their supply of materials do not contain conflict minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or adjoining countries.

AOTCO uses Technic as our Gold supplier. The vast majority (almost 90%) of the gold bullion supplied to AOTCO comes from the Royal Canadian Mint, Caridad (Mexico) and Codelco (Chile). The Royal Canadian Mint primarily processes gold ore mined in Canada as well as refining scrap generated in North and South America. Caridad mines and refines its' own gold exclusively.

AOTCO uses Palm International as our Tin Supplier. Their Tin originates in Peru under the Minsur brand. All of the concentrates used to produce the tin metal at the Funsur smelter, located at Pisco Peru, originates from Minsur's mine. (San Rafael) located in the district of Melgar in Puno, Peru.

AOTCO will not knowingly purchase raw material supplies that contain conflict minerals. Due to the complexity of the routes by which metals, and in particular precious metals, are smelted, recycled and sold, including the common practice of comingling ores and scrap from many different sources, it is often impossible for any company to obtain full traceability to an exact origin of all materials.

However, AOTCO will take continuous practical action to seek to ensure that minerals from the conflict region do not enter our supply chain, including requesting reliable certificates of origin for all material that might possibly originate in conflict areas or adjacent countries.



*Robert Gillingham*  
*Vice President*  
AOTCO Metal Finishing Co., Inc.

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